

SEALED BY ORDER
OF THE COURT

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**

Counts 1 and 2: 18 U.S.C. § 2244(a)(4) - Abusive Sexual Contact

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: 2 years' imprisonment; lifetime supervised release; \$250,000 fine; restitution; special assessment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

Enrique Chavez

DISTRICT COURT NUMBER

CR 22 104 JSW

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSESHOW
DOCKET NO.☐ this prosecution relates to a pending case involving this same defendantMAGISTRATE
CASE NO.☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form Stephanie M. Hinds

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) Mohit Gourisaria

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

1) ☒ If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: No bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments:

SEAL BY CLERK
OF THE COURT

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

FILED
MAR 10 2022
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

V.

ENRIQUE CHAVEZ,

CR 22 104 JSW

DEFENDANT(S).

INDICTMENT

18 U.S.C. § 2244(a)(4) – Abusive Sexual Contact (Two Counts)

A true bill.

/s/ Foreperson of the Grand Jury - Roy Alper

Foreman

Filed in open court this 10th day of March 2022.

Ivy L. Garcia
Ivy L. Garcia, Clerk

Donna M. Ryu
United States Magistrate Judge, Donna M. Ryu

Bail, \$ NO BAIL

SEALED BY ORDER
OF THE COURT

FILED 

MAR 10 2022
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1 STEPHANIE M. HINDS (CABN 154284)
2 United States Attorney

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4 UNITED STATES DISTRICT COURT
5 NORTHERN DISTRICT OF CALIFORNIA

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8 OAKLAND DIVISION

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10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 ENRIQUE CHAVEZ,

14 Defendant.

15 CASE NO.

CR 22 104 1

16 VIOLATIONS:

17 18 U.S.C. § 2244(a)(4) – Abusive Sexual Contact
(Two Counts)

OAKLAND VENUE

18 INDICTMENT

19 The Grand Jury charges that at all times relevant to this Indictment:

20 Introductory Allegations

21 1. The Federal Correctional Institution, Dublin (“FCI Dublin”) was an all-female
22 correctional institution that housed federal prisoners and was operated by the Federal Bureau of Prisons
23 (“BOP”).

24 2. FCI Dublin was located in Alameda County, California, within the Northern District of
25 California.

26 3. The defendant ENRIQUE CHAVEZ (“CHAVEZ”) was employed at FCI-Dublin as a
27 correctional officer. CHAVEZ held the position of Cook Supervisor/Foreman.

28 4. As a correctional officer, CHAVEZ supervised and had disciplinary authority over
female inmates incarcerated at FCI Dublin.

1 5. CHAVEZ was trained in BOP policies and procedures, which included training that
2 sexual, financial, and social relationships with inmates were (and remain) prohibited.

3 6. Victim 1, an individual known to the Grand Jury, was an inmate detained at FCI Dublin,
4 under the custodial, supervisory, and disciplinary authority of the defendant.

5 7. The term "sexual contact" meant "the intentional touching, either directly or through the
6 clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks of any person with an intent to
7 abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person."
8 18 U.S.C. § 2246(3).

9
10 **COUNT ONE**
 (Abusive Sexual Contact)

11 8. Paragraphs 1 through 7 of this Indictment are re-alleged and incorporated as if fully set
12 forth here.

13 9. In or around October 2020, in the Northern District of California, the defendant

14 ENRIQUE CHAVEZ

15 knowingly engaged in or caused sexual contact with or by Victim 1; to wit, he intentionally touched
16 Victim 1's breasts and buttocks with an intent to abuse, humiliate, harass, degrade, or arouse or gratify
17 the sexual desire of any person, all in violation of Title 18, United States Code, Section 2244(a)(4).

18
19 **COUNT TWO**
 (Abusive Sexual Contact)

20 10. Paragraphs 1 through 7 of this Indictment are re-alleged and incorporated as if fully set
21 forth here.

22 11. In or around October 2020, in the Northern District of California, the defendant

23 ENRIQUE CHAVEZ

24 knowingly engaged in or caused sexual contact with or by Victim 1; to wit, he intentionally touched

25 ///

26 ///

27 ///

28 ///

1 Victim 1's vagina and breasts with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the
2 sexual desire of any person, all in violation of Title 18, United States Code, Section 2244(a)(4).
3

4 DATED: March 10, 2022

A TRUE BILL.

6 /s/ Foreperson of the Grand Jury - Roy Alper
7 FOREPERSON

8 STEPHANIE M. HINDS
9 United States Attorney

10 /s/ Mohit Gourisaria
11 MOHIT GOURISARIA
12 Assistant United States Attorney
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